

Inspection Date	3/29/99
Time Start	
Time Finish	

HAZARDOUS WASTE	INSPECTION REPORT
S GENERATOR	S Q GENERATOR

Company name Norquey Technology Inc. Site Address Kinonbridge Industrial Center, Fr	I.D. Number <u>PAO 982363889</u>
Site Address Riverbridge Industrial Center, Fr	ont + lloyd STS, chester PA
County <u>Delauare</u> Municipality <u>Cherto</u>	- CITY ZIP 19016
Name of Inspector Auc Jandel	
Name & Title of Responsible Official David Potter, Pr.	
Person Interviewed 5%A	Telephone (6/2) 674 - 4330
Mailing Address (if different from above)	
Amount of Hazardous Waste Generated per Month:	Pounds _ > /800 Kgs
1. Site Characterization:	
🍦 STORAGE: 🖀 Container 🔲 Tanks 🔲 Containment Bldg.	☐ Drip Pad Other
PBR:	erre Tr. Other
Generator Treatment ☐ Containers ☐ Tanks ☐ Co	ontainment Bldg. □ Drip Pad
2. Universal Waste: Large Quantity Handler Small Qu	antity Handler
Universal Waste TypesNoT deTrd.	
3. Hazardous Waste Transporters:	
Transporter Name <u> 5ee 4/48</u> Insp.	License Number
Transporter Name	License Number
Transporter Name	License Number
Types of hazardous waste generated and destination facility	(location & type).
Waste Code Waste Description	Destination Facility
5 ac 11/9 \$ IND.	

Page _____ of ____

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Si	te I	Na	me	Norquey ID Number PA098236	3889 Date 3/2	9 199
				• /	on Compliance	
S	ΓA [°]	TU	S			
1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
X				Hazardous waste determination performed on all waste streams	262.11	H001
8				Identification Number	262.12	H002
K				Licensed transporters only	262.12(b)	H003
\propto				TSD Authorization received for wastes shipped within PA	262.13	H004
X				Proper manifest used	262.20	H005
A				Manifests filled out correctly and completely	262.20(g)	H006
				Manifests routed properly and within time limits	262.23	H007
				Generator waste accumulated on site for 90 days or less	262.34(a)	H008
	1			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262.34(e) (f)	H009
	2			SQG waste accumulated on-site never exceeds 6000 kg	262.34(e)	H010
				Satellite accumulation requirements complied with	262.34(c)	H011
Q				Personnel training program per 265.16 complied with (Gen 262.34(a)(5): SQG 262.34(e))	262.34(a)(5), 262.34(e)	H012
X				Manifest and biennial reports retained for 3 years	262.40(a)(b)	H013
\propto				Specified records retained for 20 years	262.40(c)(e)	H014
(X)				Biennial reports submitted to the Department (LQG only)	262.41	H015
X				Exception reporting procedures followed	262.42	H016
\varnothing				Spill reporting procedures followed	262.46	H017
		ĺ	X	PPC plan developed and implemented	262.46	H018
X	\perp	\perp		Special requirements followed for international shipments	262.50	H019
2		1		Source reduction strategy prepared and available (LQG only)	262.80	H020
\forall	\perp	_	\perp	Excluded waste complies with exclusionary requirements	261.4	H021
\perp	\perp	\perp				
	\perp	\perp	\perp			
-	_	1	_			
		\perp	\perp			
	1	1				
	T		T			

Page	of	

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name	Norgon		ID Number <u>PA098</u>	353669	Date _	3/29/49
	1 - No Violation Observed	2 - Not Applicable	3 - Not Determined			

STATUS

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				CONTAINERS (Subchapter I)		
			X	Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265.173	H028
X	1_			Containers managed to prevent leaks	265.173(b)	H029
			X	Containers labeled to accurately identify contents	265.173(c)	H030
		X		Container storage areas inspected at least weekly	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
		X		Proper containment and collection systems in place	265.178(a)-(d)	H033
		Ì	X	All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
		χ		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				TANKS (Subchapter J)		
				Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
				Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
				Secondary containment provided for tanks (systems) as required	265.193	H041
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
				Tanks labeled to accurately identify contents	265.194(d)	H043
				Required inspections completed and documented in operating log	265.195	H044
	-			Release reported to Department within 24 hours, unless exempted	265.196	H045
	1			Special requirements for ignitable and reactive wastes followed	265.198	H046
1				SQ Generator complies with 265.201	262.34(e)(3)	H047

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name	porgon	ID I	Number R0982	363881	Date 3/24/99
	1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Complia	nce

STATUS 1 2 3 4 REQUIREMENT CHAPTER CIT. LINE Containment Buildings (Subchapter T) Building completely enclosed to prevent exposure to the 265.521(a)(1) H048 elements Meets special requirements if liquids present 265.521(b) H049 Primary barrier free of significant gaps, cracks and deterioration 265.521(d)(1)(i) H050 Level of hazardous waste within unit is below containment walls 265.521(d)(1)(ii) H051 Tracking of waste out of unit by equipment or personnel 265.521(d)(1)(iii) H052 prevented No visible dust emissions at doors, windows, vents, etc. H053 265.521(d)(1)(iv) Professional engineer's certification placed in operating record 265.521(d)(2) H054 Required inspections performed and logged in operating record 265.521 H055 H056 H057 H058 H059 (Subchapter S) Drip Pads Engineer's certification of existing drip pads on file 265.501 H060 Drip pad meets 265.503 design & operating standards 265.501 H061 (a) nonearthen, sloped construction with berm to channel 265.501(a) H062 associated drippage to collection system (b) Has synthetic liner below the pad with properly constructed 265.501(b) H063 leak detection system Drip pads & collection system maintained to prevent 265.503(c) H064 deterioration H065 Drip pads & collection systems designed to prevent run off 265.503(d) H066 Run-on/run-off control system maintained unless pad protected 265.503(e) by a structure Release reporting requirements met H067 265.503(m) 265.504(b) H068 Drip pads inspected weekly and after storms when in operation H069 H070 H071 H072

Page _____ of ____

H073



Norquay Technology Incorporated, U.S.A.

P.O. Box 468 Chester, Pennsylvania 19016 (610) 874-4330 (610) 874-3575 FAX

January 4, 1999

Mr. Paul A. Jardel
Pennsylvania Department of Environmental Protection
Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428

RE: Notice of Violation dated November 6, 1998

Dear Mr. Jardel:

In response to your notice of violation, may we offer the following:

- 1) The staff has been re-instructed in the proper sitting of waster containers. The warehouse supervisor will inspect the area to insure that the access remains clear.
- 2) The facility emergency response plan will be re-written to comply with § 262.46(e). This will be completed no later than February 19, 1999.

Yours truly,

Shaun Shannon

Clerk

ER-WM-129: Rev. 2/96

Inspector (signature)

COMMONWEALTH OF PENNSYLVANIA **DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT**

	INSPECTION REPORT COM	MENTS
Date of inspection 3/29/99	ID Number_ PAD98	2363889
Company/Facility/Site NameN	orquay Technology Inc.	
EPS James Grabusky along with Mi	• •	as done by Department WMS Paul Jardel and the recent departure of Mr. Shannon, Mr. pection the following was observed:
	This condition is a continuing violation	formation, required from the local authorities, on of 262.46. Mr. Potter stated that he is
•	area contained app. 42 drums staged on a rectangular block that did not meet t	portable containment pallets. As during the the requirements of 265.178(e)(3).
	o the inspection it was observed that the	e drums were going to be transported offsite as containers were unlabeled. This is a possible
The facility should be aware that we 265.174.	eekly secondary containment inspection i	records should be kept, in compliance with
Mr. Potter stated that the empty dru shortly. All will be rinsed prior to fin	ms staged in the outside area located adjust disposition.	acent to the PQ Corp. will be evaluated
process" solvents that are reused ons	ite only for that particular process so as even then it may be that it can be utilize	d. The manufacturing process generates "in not to cross contaminate another process. d by another facility. The DEP Pollution
Reviewed 1998 manifests indicate the were executed properly.	nat the facility generates app. 18,000 lbs	of hazardous waste per. month. All manifests
No other violations were observed de	uring this inspection.	
any violations observed during the inspection. identified as a result of review of laboratory anal. This report does not constitute an or immunity from legal action for any violation note.	Additional notification of violations may be issued of yses or Department records. der or other appealable action of the Department, d herein. does not necessarily imply concurrence with the fin	ative of the Department. This report is formal notification of concerning either violations noted herein, or other violations. Nothing contained herein shall be deemed to grant or imply dings on this report, but does acknowledge that the person
Person interviewed (signature)	Copy mailed to facility	Date 4/6/99

Date 4/6/49



Pennsylvania Department of Environmental Protection

555 North Lane Conshohocken, PA 19428 April 6, 1999

Southeast Regional Office

610-832-6212 Fax 610-832-6143

NOTICE OF VIOLATION

Mr. David Potter, P.E. Norquay Technonogy Inc. P.O. Box 468 Chester, PA 19016

Re: Follow up Inspection

March 29, 1999 PAD982363889 Chester City Delaware County

Dear Mr. Potter:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 270 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

Hazardous waste containers located in the facility warehouse were not provided the aisle space which insures access for purposes of inspection, containment and remedial action with emergency vehicles, contrary to §262.34(c), Reference §265.178(e)(3).

The facility Emergency Response Plan (PPC Plan) remains incomplete, in violation of § 262.46(e).

Containers staged outside of the facility building were unlabeled, in violation of § 262.34 Reference § 265.173(c).

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program

indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Protection.

If you have any questions concerning this matter, please feel free to contact me at 610-832-6175.

Sincerely,

Paul A. Jardel

Waste Management Specialist Waste Management Program

Int while

cc: Compliance
James Grabusky
Regional File
US EPA

Re 30 (LK99)91-6



Inspection Date	11/3/98
Time Start	04:00
Time Finish	

HAZARDOUS WASTE INSPECTION REPORT GENERATOR GENERATOR

ne & Title of Responsions Address (if different ount of Hazardous Wassite Characterization)	Multiple Official Mr. Port of Market And the	skieur skannen Ellarton T	elephone ()
ne & Title of Responsions Address (if different ount of Hazardous Wassite Characterization)	Multiple Official Mr. Port of Market And the	skieur skannen Ellarton T	ZIP
ne & Title of Responsion son Interviewed ling Address (if difference ount of Hazardous Wa Site Characterization	ible OfficialMr. Mr. Norwan ent from above) aste Generated per N	. Ellarton T	elephone ()
son Interviewed	ent from above) aste Generated per N	. Ellarton T	elephone ()
ling Address (if differe ount of Hazardous Wa Site Characterization	ent from above) aste Generated per N		
ount of Hazardous Wa Site Characterization	aste Generated per N		
Site Characterization		Month: Po	unds Kgs
	n:		
STORAGE: E Cor			
	ntainer 🔲 Tanks	☐ Containment Bldg. ☐ Drip	Pad Other
PBR: ☐ Neu	ıtralization/WWTP	☐ Reclaim	Other
Generator Treatment	□ Containers	☐ Tanks ☐ Containm	ient Bldg. 🔲 Drip Pad
Universal Waste:] Large Quantity Ha	ndler 🔲 Small Quantity F	Handler
Universal Waste	Types		100 100 100 100 100 100 100 100 100 100
Hazardous Waste Tr	ansporters:	motor Lines	AL07812 H 26340
Transporter Name	ASKILLE CA	remied Co. L	icense Number A.H. 0/2.1
Transporter Name	e Oart Truck	ing Co. INC. L	icense Number A4 - 0219
Transporter Name	Safety Kloen	Li	icense Number AN - 0/72
Types of hazardous	waste generated a	nd destination facility (locati	on & type). 2 78 0607380
Waste Code	Was	ste Description	Destination Facility
وردي ، احد ٥	wapte Flow	Lig MS. ETOH,	Ashbul General to.
0.001	organic was	7e. 50/ide	ENSED INC.
0001, 6005		5. Tolowe, N- Fight CH	Safoty Klen Wip.
	1 1	11. AUT / - 1 1	
1001-18 F001-5	waste from L	-14.142/ SOLACE. OFFICE	Fisher Industrial Sorvice Chance AL
0001-18	waste from L		Fisher Industrial Sorvice Chancoe AL.
0001-18	waste. I from h	-14.1-3/saluce. Oppini	Fisher Industrial Sorvice Chance Ah.
0001-18	waste. I from h	Transportation of the second	Fisher Industrial Sorvice Chancoe Ah.
0001-18	waste. I from h	Transportation of the second	Fisher Industrial Sorvice Chance Ah.
	Universal Waste: Universal Waste Transporter Name Transporter Name Transporter Name Types of hazardous Waste Code	Universal Waste: Large Quantity Ha Universal Waste Types Hazardous Waste Transporters: Fisher Transporter Name Ashlead Cl Transporter Name Cart Truck Transporter Name Safety Klose Types of hazardous waste generated and Waste Code Waste Code Universal Waste Universal Waste Universal Waste Universal Waste Universal Waste	Hazardous Waste Transporters: Fisher Industrial Services Transporter Name Ashland Chemical (o. L. Transporter Name Cart Tryching Co Inc. L. Transporter Name Safity Kloser Types of hazardous waste generated and destination facility (location of the safety of the proposal organic waste solid.

Page _____ of ____

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name	Norgray Feel	w/09,4 11	O Number PAL 98	363887	Date	11/3/98	
		2 - Not Applicable	3 - Not Determined				

STATUS

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
X				Hazardous waste determination performed on all waste streams	262.11	H001
X				Identification Number	262.12	H002
				Licensed transporters only	262.12(b)	H003
X				TSD Authorization received for wastes shipped within PA	262.13	H004
\triangleright				Proper manifest used	262.20	H005
X				Manifests filled out correctly and completely	262.20(g)	H006
X	,			Manifests routed properly and within time limits	262.23	H007
			X	Generator waste accumulated on site for 90 days or less	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262.34(e) (f)	H009
	2			SQG waste accumulated on-site never exceeds 6000 kg	262.34(e)	H010
X				Satellite accumulation requirements complied with	262.34(c)	H011
X				Personnel training program per 265.16 complied with (Gen 262.34(a)(5); SQG 262.34(e))	262.34(a)(5), 262.34(e)	H012
X				Manifest and biennial reports retained for 3 years	262.40(a)(b)	H013
X				Specified records retained for 20 years	262.40(c)(e)	H014
		χ		Biennial reports submitted to the Department (LQG only) checked	262.41	H015
X				Exception reporting procedures followed	262.42	H016
X				Spill reporting procedures followed	262.46	H017
			X	PPC plan developed and implemented (incles of)	262.46	H018
	X			Special requirements followed for international shipments	262.50	H019
		X		Source reduction strategy prepared and available (LQG only)	262.80	H020
X	,			Excluded waste complies with exclusionary requirements	261.4	H021
-	_			·		
-						
		- 1				

Page	of	

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

		/
Site Name No gray Technology	ID Number FAC962363889_	Date 11/3/98
one ivalie.	ID ITALIES	

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

		3		REQUIREMENT	CHAPTER CIT.	LINE
				CONTAINERS (Subchapter I)		
			X	Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
X	r L			Containers kept closed except during addition or removal of wastes	265.173	H028
\mathcal{M}				Containers managed to prevent leaks	265.173(b)	H029
		X		Containers labeled to accurately identify contents Fee comments	265.173(c)	H030
		X		Container storage areas inspected at least weekly	265.174	H031
K				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
X				Proper containment and collection systems in place	265.178(a)-(d)	H033
			X	All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
		X	,	Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
	1			TANKS (Subchapter J)		
	7			Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
				Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
				Secondary containment provided for tanks (systems) as required	265.193	H041
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
				Tanks labeled to accurately identify contents	265.194(d)	H043
				Required inspections completed and documented in operating log	265.195	H044
				Release reported to Department within 24 hours, unless exempted	265.196	H045
	\int			Special requirements for ignitable and reactive wastes followed	265.198	H046
	P			SQ Generator complies with 265.201	262.34(e)(3)	H047

Page	of	
Page	OI .	

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name No your Techn	0/20/4 1	D Number PARGES	63889	Date _	11/3/90
1 No Violation Observed	2 Not Applicable	3 Not Determined	4 - Non Complian	000	

STATUS

2 3	4	REQUIREMENT	CHAPTER CIT.	LINE
		Containment Buildings (Subchapter T)		
		Building completely enclosed to prevent exposure to the elements	265.521(a)(1)	H048
		Meets special requirements if liquids present	265.521(b)	H049
		Primary barrier free of significant gaps, cracks and deterioration	265.521(d)(1)(i)	H050
		Level of hazardous waste within unit is below containment walls	265.521(d)(1)(ii)	H051
		Tracking of waste out of unit by equipment or personnel prevented	265.521(d)(1)(iii)	H052
		No visible dust emissions at doors, windows, vents, etc.	265.521(d)(1)(iv)	H053
		Professional engineer's certification placed in operating record	265.521(d)(2)	H054
		Required inspections performed and logged in operating record	265.521	H055
				H056
				H057
				H058
				H059
1		Drip Pads (Subchapter S)		
		Engineer's certification of existing drip pads on file	265.501	H060
		Drip pad meets 265.503 design & operating standards	265.501	H061
		(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265.501(a)	H062
		(b) Has synthetic liner below the pad with properly constructed leak detection system	265.501(b)	H063
		Drip pads & collection system maintained to prevent deterioration	265.503(c)	H064
		Drip pads & collection systems designed to prevent run off	265.503(d)	H065
		Run-on/run-off control system maintained unless pad protected by a structure	265.503(e)	H066
		Release reporting requirements met	265.503(m)	H067
		Drip pads inspected weekly and after storms when in operation	265.504(b)	H068
				H069
				H070
				H071
				H072
				H073

Page _____ of ____

ER-WM-129: Rev. 2/96

Date of inspection 11/3/98

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

___ID Number___PAD982363889

Company/Facility/Site Name Nor	quay Technology Inc.	
This routine hazardous waste large question Specialist Paul Jardel along with Mr. observed:	nantity generator inspection of the above Vaughn Ellerton, Norquay Vice Presid	ve facility was done by Department Solid Waste ent. During this inspection the following was
Mr. Elerton stated that the facility has and 1,500 gallons.	s increased production capacity due to	the installation of new reaction vessels of 1,000
drums are overturned on an elevated c	e facility in an area next to the neighborontainment pallet that has four wash nearly. This is piped to the stripping unit.	oring PQ Corp. Mr. Ellerton stated that empty ozzles. Rinsate, collected by the pallet, is All cleaned drums are then scrapped.
As observed during previous inspection neutralization prior to release to the Po		s discharges to the sanitary sewer does pH
	s waste vacuum pump oil, presently sto on area provisions of 262.34(c). This is	ored inside of a large plastic pan, may now be sidue to a recent regulatory change.
hazardous waste. The floor, previously	y coated, shows spalling on the floor, l	s of properly labeled D001-18, F003-5 ikely from exposure to process waste waters of has deteriorated from the same exposure.
drums staged on portable containment pallets of chemicals. This condition is	pallets. The pallets formed a rectangues in violation of 265.178(e)(3). A few of a material that had begun leaking, so	e, near the loading dock, consisted of app. 40 lar block that was blocked in on three sides by of the containers were unlabeled. Mr. Ellerton it had been placed on a containment pallet. The
	elines will be forwarded to the facility.	s observed to be inadequate in violation of Facility Engineer, Mr. David Potter, P.E.,
Reviewed 1998 manifests indicate that were executed properly.	it the facility generates app. 18,000 lbs	. of hazardous waste per. month. All manifests
any violations observed during the inspection. A identified as a result of review of laboratory analysm. This report does not constitute an order immunity from legal action for any violation noted	Additional notification of violations may be issued ses or Department records. er or other appealable action of the Department. herein. loes not necessarily imply concurrence with the file	tative of the Department. This report is formal notification of concerning either violations noted herein, or other violations. Nothing contained herein shall be deemed to grant or imply andings on this report, but does acknowledge that the person
Person interviewed (signature)	Copy mailed to facility	Date 11/23/98
Inspector (signature)	Gostal or rest 1	Date

ER-WM-129: Rev. 2/96

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 11/3/98	ID Number_ PAD9823638	89
Company/Facility/Site Name No	rquay Technology Inc.	
Personnel training, including RCRA inspection.	communications training was being given to t	wo new employees during this
mixtures was determined to have form The "in process" solvents are describ	as disposed of much of the "in process" recovered a quaternity compound that is difficult to ever as being utilized during specific processes, ess. The solvents are able to be reused a number one or another similar process.	crack. , and contaminated with a small amount
No other violations were observed du	aring this inspection.	
any violations observed during the inspection. Identified as a result of review of laboratory analy. This report does not constitute an ordinamunity from legal action for any violation noted.	der or other appealable action of the Department. Nothing I herein. does not necessarily imply concurrence with the findings o	ing either violations noted herein, or other violations contained herein shall be deemed to grant or implementations.
Person interviewed (signature)	Copy mailed to facility	Date 11/ 2 3/98
Inspector (signature)	Pada ful	Date///3/-/6'



Pennsylvania Department of Environmental Projection

Lee Park, Suite 6010 555 North Lane Conshohocken, PA 19428 November 6, 1998

Southeast Regional Office

610-832-6212 Fax 610-832-6143

NOTICE OF VIOLATION

Mr. Shawn Shannon Norquay Technonogy, Inc. P.O. Box 468 Chester, PA 19016

Re: Hazardous Waste Inspection

November 3, 1998 PAD982363889 Chester City Delaware County

Dear Mr. Shannon:

Prografices forms and the

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 270 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

Hazardous waste containers located in the facility warehouse were not provided. The aisle space which insures access for purposes of inspection, containment and remedial action with emergency vehicles, contrary to required by § 262.34(c), Reference § 265.178(e)(3).

The facility Emergency Response Plan (PPC Plan) is inadequate and should be revised in accordance with § 262.46(e).

You are hereby notified of both the existence of these violations, as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising, prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Protection.

If you have any questions concerning this matter, please feel free to contact me at 610-832-6175.

Sincerely,

Paul A. Jardel

That afre

Waste Management Specialist Waste Management Program

cc: Compliance

Mr. Grabusky Regional File U.S. EPA

Re 30 (SMC98)302-2

Bureau of Waste Management

Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

			1-N	o Violation Observed 2-Not Applicable 3-Not Determined 4-Non-C	Compilance	
Status			0501105115117	Clation		
1	2	3	4	REQUIREMENT	40 CFR Part 268	
				Generators		
χ				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
X				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
X				Dilution not used as a substitute for treatment.	3	
				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(
	1			Storage Facilities		
				Facility verifies generators classification of waste in accordence with waste analysis plan.	25 Pa Code 265.13(c)	
7				Containers marked to identify contents and accumulation date.	50(a)(2)	
1				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
7				Notification and certification sent with shipments of wastes meeting treatment standards.	7(2)(2)	
1				Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)	
7				Treatment Facilities, Including PBR and RRR Facilities		
7	\top			Dilution not used as a substitute for treatment.	3	
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)	
				Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5) (b)(6)	
I				Land Disposal Facilities		
T		T	T	Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)	
T		T		Facility land disposes of restricted waste only if it meets applicable treatment standard.	40	
L	1		1	Facility retains copies of generator notifications and certifications.	7(c)(1)	

		en e
		•
		•
		•

ER-WM-300: Rev. 11/93 Part A

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of Inspection	2/23/96 Ti Fack Tariba	me start <u>パラ</u> っ	Time finish _	
Name of Inspector	fack Tarible			
Company, installation	name Norquing ?	Technology I.	٧٥.	1 575. CLOST PA 1401
Location River	ridge Industrion	futh.	Front + 1bya	1 55. CLOST PA 140
County Colours		Municipality _	cheffer City	
Identification number	1 1A098=36388	9		
Name of responsible of	official NOINON EL	terton		
Title vice Pre	enden			
Area code and telepho	one number (610) 87	4-4330		
Name of person inters	viewed 5 Laun 5/	annon		
Title Env. 40	pliares			
Mailing address (if dif	ferent from above)			
Area code and telepho	one number			
Current waste ha	indling method:			
	☐ treatment,	storage,	disposal	☐ PBR
b. 図On-site	use,	reuse,	recycle,	⊠ reclaim
c. ⊠'Off-site	☐ treatment,	storage,	⊠ disposal	
d. Off-site	use,	reuse,	recycle,	□reclaim
2. Amount of hazar	dous waste produced:			
	so (~3k)	kg./mo.		
Types of hazard location and type	lous waste produced by e).	Hazardous Waste N	lumber and destination	on facility (include
Waste Number	Destination	Facility	Location an	d Type
A001, 2, 18, 28,3	Shohland chemins	160.	Brigham Ton	NY.
	movine shale			
	Evergreen ENU /A			
	Saket, Wen Co		Linden NJ.	
D006, 8	surety When w	o i p	West cleater	PR.
4. Source Reduction	n: accomplished, so pro	posed, not proposition one to en	sed acongrass the h Treams produce	undreds)

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name	Norgeny Feelmoligy	ID Number	PAD982363889	Date	2/23/96
-----------	--------------------	-----------	--------------	------	---------

Hazardous Waste Inspection Report Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance **STATUS** LINE **CHAPTER** REQUIREMENT 2 CITATION ITEM 3 | 262.11 H001 Hazardous waste determination, performed on all waste streams 262.12 H002 Identification number H003 Hazardous waste shipments offered only to licensed transporters 262.12(d) Authorization received from TSD facility for wastes shipped off-site within 262.13 H004 H005 PA manifest used for intrastate shipments 262.20(b) 262.20(c) H006 TSD state manifest or PA manifest used for out-of-state shipments Manifests filled out properly and completely 262.20(g) H007 F5-5K H008 Manifests routed properly and within time limits (7 days) 262.23(e)(f) 262.30(1) H009 Proper U.S. DOT shipping containers or packages being used H010 Shipping containers marked and labeled according according to U.S. DOT 262.30(2) H011 262.30(3) Containers of 110 gal. or less permanently marked with required hazardous waste label H012 262.33 Placards offered to transporter H013 262.34(a)(1) Waste in containers or tanks accumulated on-site for less than 90 days. 262.34(a)(2) H014 Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J H015 Containers managed in accordance with Chapter 265, Subchapter I (any non-262.34(a)(3) compliance for Subchapter I requirements is a violation of 262.34(a)(3)) H016 265.171 a). All containers of haz, waste in good condition H017 b). 265.172 Containers compatible with hazardous waste being stored within H018 265.173(a) c). Containers of hazardous waste kept closed H019 265.173(b) Containers of hazardous waste are managed to prevent leaks d). Containers of hazardous waste labelled to accurately identify contents H₀20 265.173(c) e). H021 265.174 Haz, waste accumulation areas inspected at least weekly f). 265.176 - .177 H022 Special requirements for ignitable, reactive and incompatible waste g). being met 265,178 H₀₂₃ Proper containment and collection system(s) H₀₂4 Containers clearly marked with accumulation date and visible for inspection 262.34(a)(4) 262.34(a)(5) H025 On the job or classroom personnel training program as per 265-16

Hazardous Waste Inspection Report Generators - Part B

4-Non-Compliance 1-No Violation Observed 2-Not-Applicable 3-Not-Determined **STATUS** LINE CHAPTER REQUIREMENT CITATION ITEM 2 3 4 H026 262.40(a) Records retained at designated location for 20 years 262.41(a) H027 Quarterly reports submitted to the Department 262.42 H028 Exception reporting procedures followed 262.45 H029 Hazardous waste disposal plan, if required H030 262.46(a) Spill reporting procedures followed H031 Preparedness, Prevention and Contingency Plan developed and 262.46(e) implemented in accordance with Chapters 264 and 265 H032 262.50,.53, Special requirements followed for international shipments .55, .60 262.80 H033 Source reduction strategy prepared and available

ER-WM-129: Rev. 12/93

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection_	2/23/96	Identification Number	PAD982363889	
Company/Facility/S	ite Name	Norquay Technology Inc.		
		e quantity generator inspection of the above facility was r. Shawn Shannon of Norquay.	done by Departr	nent Solid Waste
During this inspection	the following	g was observed:		
waste containers staged hazardous waste oil wh units. There were 25 da	d in the warel nich is stored rums of haz v	staged in the production room had secondary containment and inside of a large plastic pan, all hazardous waste is stagwaste stored in the warehouse area during this inspectional is should be properly identified.	d are properly lab ged on portable p	eled. Except for
may be there pending of incompatible wastes. T	lisposal. Any he chemicals	staged in the warehouse area, outside of any containment hazardous wastes should be placed into secondary containcluded the following; At least three bottles of Methage bottles of 4-Dimethylaminopyradine.	tainment, and seg	gregated from other
Appx. 2/3 of the hazar	rdous waste g	enerated at this facility is transported to Ashland Chem	nical Co.	
The waste water tank prior to release to the P		rges to the sanitary sewer now has a pH monitor which	controls HCl and	l NaOH neutralization
concrete, has deteriorat	ted over the y	s pumped to the above tank collects liquid wastes with ears. and been previously coated, has returned to its previous		sump, constructed of
the materials as solvent process. The solvents a	ts utilized dur re able to be	ent may not be a waste as had been described during pre- ring specific processes, and contaminated with a small a reused a number of times prior to redistillation or dispo- ge number of specialty products (over 100) there are a l	amount of assocional, but only with	iated material from that n for that one process.
Personnel training, ur	ndertaken mo	nthly, is provided to all employees. The standards of 26	65. 16 should be a	adhered to.
According to Mr. Shar	nnon the two	below grade ASTs are still in the same condition as bel	fore.	
No violations were obs	served during	this inspection.		
any violations observed dur identified as a result of revie This report does immunity from legal action f	ring the inspecti ew of laboratory not constitute a for any violation person interview	wed does not necessarily imply concurrence with the findings on t	g either violations no contained herein sha	oted herein, or other violations Il be deemed to grant or imply
Person interviewed	(signature)	Copy mailed to facility	Date	2/26/96
Inspector (signature	B)	Copy mailed to facility	Date_	2/26/95
		·		Page of

ER-WM-300: Rev. 11/93

Date of Inspection _1/26/95

K.

Time finish _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Time start _____

Company, installation nam	ne norquiry	rechnology 2	.n(.	
Location Riverbuilge	Industrial	Fron	T + /hild sts.	chester PA 1966
County Odinale		Municipality _	Claster City	
Identification number	PAO 982 363 89	89		
Name of responsible officia	al norman Elle	グー		
Title Vice Fresid	int			
Mailing Address 500		•		
Area code and telephone n	number (610) 87	4-4330		
Name of person interviewe				
Title EN. Sapl.	and			
Mailing address (if differer	nt from above)			
Area code and telephone n	number			
Current waste handling	ng method:			
a. 🛭 On-site	treatment,	storage,	disposal	∏ P8R
b. On-site	use,	reuse,	recycle,	☑reclaim 266.91
c. 🛭 Off-site	☐ treatment,	storage,		
d. 🗆 Off-site	□use,	reuse,	recycle,	☐ reclaim
2. Amount of hazardous	waste produced:			
a		kg./mo.		
3. Types of hazardous volume location and type).			umber and destination	on facility (include
Waste Number	Destination	Facility	Location ar	nd Type
000 1, 2, 18, 28,35,36				
Fxx 3, 4, 5				
l. Source Reduction: 🔲	accomplished = sec	noted \square not necess	e ad	
. Source Reductions []	accombination and but	sharea' 🗀 nor higho:	,,,,	

ER-WM-300: Rev. 11/93

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name	Norgony	Fechnology	ID Number	PAR 962 363889	Date	1/26195

Hazardous Waste Inspection Report

	STA	TUS		No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Co	ompliance
1	2	3	4	REQUIREMENT	CHAPTER CITATIO
X				Hazardous waste determination, performed on all waste streams	262.11
$\langle $				Identification number	262.12
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)
\langle				Authorization received from TSD facility for wastes shipped off-site within PA	262.13
7				PA manifest used for intrastate shipments	262.20(b)
श				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)
7		X		Manifests filled out properly and completely	262.20(g)
1				Manifests routed properly and within time limits (7 days)	262.23(e)(f)
7				Proper U.S. DOT shipping containers or packages being used	262.30(1)
1				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)
				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)
T		V		Placards offered to transporter	262.33
T		X		Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)
1				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)
		X		Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)
1				a). All containers of haz, waste in good condition	265.171
1				b). Containers compatible with hazardous waste being stored within	265.172
1				c). Containers of hazardous waste kept closed	265.173(a)
1	T			d). Containers of hazardous waste are managed to prevent leaks	265.173(b)
1				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)
T	\exists			f). Haz. waste accumulation areas inspected at least weekly	265.174
1				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176177
1				h). Proper containment and collection system(s)	265.178
T				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)
1	1	\neg		On the job or classroom personnel training program as per 265.16	262.34(a)(5)

Hazardous Waste Inspection Report Generators - Part B

1-No Violation Observed 2-Not-Applicable 4-Non-Compliance 3-Not-Determined **STATUS CHAPTER CITATION** REQUIREMENT 2 3 4 Records retained at designated location for 20 years 262.40(a) 262.41(a) Quarterly reports submitted to the Department Exception reporting procedures followed 262.42 Hazardous waste disposal plan, if required 262.45 Spill reporting procedures followed 262.46(a) Preparedness, Prevention and Contingency Plan developed and 262.46(e) (FBR??) implemented in accordance with Chapters 264 and 265 Special requirements followed for international shipments 262.50,.53,.55,.60 Source reduction strategy prepared and available by January 7, 1994 262.80

	•••	
		•
		•
		P.
		*
		•
•		
•		

.... Isaululai nespuise Center (800) 424-8802 and the PA DER (717) 787-4343

Harrisburg, PA 17105-8550 OFFICIAL PENNSYLVANIA MANIFEST FORM

	 Form approved.
è,	5.4
	 , 5468 No. 2060-00 Supher \$-38-04
	 STREET, SQUARE, SALES

		A D 9			0001	01	l but is re	ented by 8	tale law.
i. Generator's I	Name and Malling Address	kiverbri	ldge Indu:	strial Park		A. Stat	PAE 0	5166	81
		300 :400	Frank S	163		B. State	Gen. ID		
	Phone (215)374 1 Company Name	4338 Ear		6. US EPA ID Numbe			SALE Trans. ID		
•	c Special Commo	ditios	lak o	9 5 1 9 0			- IA HIO	44 D	o Ol
	2 Company Name	422113	1 3	8. US EPA ID Numbe			sporter's Phone		
							Trans. ID	_	_
_	Facility Name and Site Ad			10. US EPA ID Numi	ber	PA		l,	
	iviro-unencal Se v South Harris		Georgia	, l'1C.			sporter's Phone Facility's ID		
	GA 30720		I G A D	0 0 0 2 2	2 0 3 3	(ity's Phone (<u> </u>	6477
1. US DOT De	escription (Including Prope	er Shipping Nam			12. Contai		13. Total Quantity	14. Unit	I. Waste N
84, Was 4.1, 9:	ots Flammable S 81325, PG []. (Soutda, (D301.200)	1. FOO5)	•	2)	DM	-	OP	0001, Fu
				(ERG #31)			100	,0 1	!
integral Mean	300 Flamma ble 1 993, PG 11, (00		·•0•9•,(#	ekaka,Aderana (EkG #27)		DIN	1160	OP	D991
ity, Was	sta Finamble S N1325, PG II. (ol ds s, n.	, (મ	enand,Acetone	· 1 —			D	D001
4.1. U	713,3, PG II. ((10001)		(ERG #31)	03	DIN	15	OP	
	993, PG II, (30				09	D M	337	SP	0001,001 F0 03, F00
Additional De	escriptions for Materials Li Physical State	sted Above	Lab Pack	Physical State		K. Hand	lling Codes for	Wastes List	ed Above
		5000	1 1	1 1				l	
- 1 1	12 1:0002 3	205930	e	LSLEDS	#26 5995	•		C.	
• []						1		I	
b	т чля +		d. L	L. Juans	#23 8 997	b .		d.	·····
ંતાનાં ≨8	ਹਿਤ ਆਪਣੇ ਆ dling Instructions and Add 34411	ditional Informat				b .			
6. GENERAL classified, po	dling Instructions and Add 34411 TOR'S CERTIFICATIOn Cocked, marked, and labeled and ge quantity generator. I certified that I have selected the proment. OR, if I am a small	DN: I hereby dec	itare that the conditions in proper conditions or the conditions of the conditions o	tents of this consignment on for transport by highwi reduce the volume and to ge, or disposal currently a	are fully and acc ay according to ap exicity of waste ge- available to me wh	nerated to	ernational and nat the degree I have zes the present an	proper shippy ional government determined to deferment three	nent regulations be economically to human healt
6. GENERAL classified, po	dling Instructions and Add 4411 TOR'S CERTIFICATIOn Country of the property of the proposed in the proposed i	DN: I hereby dec	itare that the conditions in proper conditions or the conditions of the conditions o	tents of this consignment on for transport by highwi reduce the volume and to ge, or disposal currently a	are fully and acc ay according to ap exicity of waste ge- available to me wh	nerated to	ernational and nat the degree I have zes the present an	proper shippy ional government determined to deferment three	nent regulations be economically to human healt
6. GENERAL classified, point to the environmental to member of the environmental to the envir	dling Instructions and Add 34411 TOR'S CERTIFICATIO coked, marked, and labeled and ge quantity generator. I certified that I have selected the pr ronment. OR, if am a small ne and that I cyn afford bed Name Acknowledgement of Receipt of	DN: I hereby dec	itare that the conditions in proper conditions or the conditions of the conditions o	tents of this consignment on for transport by highwi reduce the volume and to ge, or disposal currently a ood faith effort to minimize	are fully and acc ay according to ap exicity of waste ge- available to me wh	nerated to	ernational and nat the degree I have zes the present an	proper shippy ional government determined to deferment three	nent regulations be economically to human healt
6. GENERAL classified, point of the environmental to menuity available to menuity for the environment of the	dling Instructions and Add 4411 TOR'S CERTIFICATION COMMENT OF THE PROPERTY O	N: I hereby dec d are in all respective method is quantity generator.	itare that the conditions in proper conditions or the conditions of the conditions o	tents of this consignment on for transport by highwi reduce the volume and to ge, or disposal currently a ood faith effort to minimize	are fully and acc ay according to ap exicity of waste ge- available to me wh	nerated to	ernational and nat the degree I have zes the present an	proper shippy ional government determined to deferment three	nent regulations be economically to human healt
6. GENERAL classified, point to the environmental to member of the environmental to the envir	dling Instructions and Add 34411 TOR'S CERTIFICATIO coked, marked, and labeled and that I have selected the pronument. OR, if am a small me and that I can afford bed Name Acknowledgement of Receipt of ped, Name Acknowledgement of Receipt of ped, Name	N: I hereby dec d are in all respective method is quantity generator.	itare that the conditions in proper conditions or the conditions of the conditions o	tents of this consignment on for transport by highwi reduce the volume and to ge, or disposal currently a ood faith effort to minimize	are fully and acc ay according to ap exicity of waste ge- available to me wh	nerated to	ernational and nat the degree I have zes the present an	proper shippy ional government determined to deferment three	nent regulations be economically to human healt
6. GENERAL classified, por transporter to Printed Typ 17. Transporter T. Printed Typ 18. Transporter T. Printed Typ	diing Instructions and Add diing Instructions and Add diing Instructions and Add diing Instructions and Add diing Instructions and Instructions and Instruction and Instructio	N: I hereby dec d are in all respective method is quantity generator.	itare that the conditions in proper conditions or the conditions of the conditions o	reduce the volume and to ge, or disposal currently a cod faith effort to minimal Signature	are fully and acc ay according to ap exicity of waste ge- available to me wh	nerated to	ernational and nat the degree I have zes the present an	proper shippional government of the distance o	be economically to be economically to human heart ent method that
6. GENERAL classified, por til 1 am a large practicable air available to in Printed Typ Printed Typ Printed Typ Printed Typ	dling Instructions and Add 34411 TOR'S CERTIFICATIO coked, marked, and labeled and that I have selected the pronument. OR, if am a small me and that I can afford bed Name Acknowledgement of Receipt of ped, Name Acknowledgement of Receipt of ped, Name	N: I hereby dec d are in all respective method is quantity generator.	itare that the conditions in proper conditions or the conditions of the conditions o	reduce the volume and to ge, or disposal currently a cod faith effort to minimal Signature	are fully and acc ay according to ap exicity of waste ge- available to me wh	nerated to	ernational and nat the degree I have zes the present an	proper shippional government of the distance o	be economically to be economically to human heart ent method that
6. GENERAL classified, point of the end of t	diing Instructions and Add 4411 TOR'S CERTIFICATION Cocked, marked, and labeled and ge quantity generator. I certified that I have selected the pronoment. OR, if I am a small ne and that I can afford be a selected the property of the color of the colo	DN: I hereby dec dare in all respective method of quantity generator waterals.	clare that the consist in proper conditions of treatment storar is have made a g	reduce the volume and to ge, or disposal currently a good faith effort to minimize Signature Signature Signature Signature	are fully and acc ay according to ap existity of waste general and the white and waste general and the waste g	nerated to lich minimi, ration and s	ernational and nai	proper shippional government of the distance o	be economically to be economically to human heart ent method that

P. O. Box 8550 Harrisburg, PA 17105-8550 OFFICIAL PENNSYLVANIA MANIFEST FORM

OMB No. 2060-0039 Expires 9-30-92

	•
ER	-WM-51 REV.
	UNIFOR
	WAST
	3. Generator's

in case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DER (717) 787-4343

	INIFORM HAZARDOUS WASTE MANIFEST		rator's US EPA ID I	®891 [™]	Manifest cument No.	2. Page of	is not req		haded areas 🕠 ederal law tate law.
3.	Generator's Name and Mailing Add				V		Manifest Docum		
s .	215 8 74 - 433 Generator's Phone ()	b 800 Wester	t trontas	logies strial Par reel 3	_	B. State	Gen. ID		
	Transporter 1 Company Name		6.	US EPA ID Number	551	C. State	Trans. ID	100	\
	J. B. Hunt Special Transporter 2 Company Name	.I Lammouite	8. AKU 9.	US EPA ID Number	3 3 1	D. Trans	sporter's Phone		820-000
	Designated Facility Name and Site	Address	10.	US EPA ID Number		E. State PA-	Trans, ID		1
E	NSCO Environmental 015 New South Harr	Services of	GA, Inc.				porter's Phone Facility's ID	()	
	Dalton, GA 30720		IGA DO	00222		H. Facili	ty's Phone ()	
١.	. US DOT Description (Including Pr	oper Shipping Nam	e, Hazard Class, an	d ID Number)	12: Contair No.	Type	13. Total Quantity	Unit Wt/Vo	Waste No.
	RQ, Waste Flamme		, N.O.S. (He	xane, Acetone)					
	4.1 , UN1325 , PG]				21	DM	840	o P	D001
-	RQ, Waste Flamma (Toluene, ammonium	ble Liquids	, Corrosive	, N.O. S.,					P003, P00
_	(Toluene, am monium	Hydroxide)	, 5, 41, -1-1	1PG 1	02	DM	75	O P	D002
								S 144	
1	Additional Descriptions for/Misferial	Listed Above	Lab Pack Ph	ysical State	- 7	K. Handi	ing Codes for W	astes Liste	d Above
		5990	c						1f
ь.	.	164	<u>a </u>	1		<u> </u>	7.	d. +	
	Special Handling Instructions and	Additional Informat	lon			1.0	1	1. 500 000	Name of the last
					•		, 7 ∂'	- 4	American writer the region
						145			
_	Load 84411 .	1 4.	\$ 100 m	; <u> </u>		·:	14.	, · · ·	4.
- 6	. GENERATOR'S CERTIFICAT classified, packed, marked, and labeled	FION: I hereby decided and are in all respects	lare that the contents in proper condition fo	of this consignment are r transport by highway a	fully and according to app	urately describing	cribed above by p	oper shippi nal governm	ng name and are nent regulations.
6	classified, packed, marked, and labeled	fand are in all respects	s in proper condition fo	ir transport by highway a	ccording to app	olicable inte	rnational and natio	nal governπ	ient regulations.
5	GENERATOR'S CERTIFICATE Classified, packed, marked, and labeled if I am a large quantity generator, I control of the environment; OR, if I am a snavailable to me and that I can afford Printed/Typed Name	fand are in all respects	ogram in place to reduce to reduce to rearment, storage, of the table to the table table to the table ta	ir transport by highway a	ccording to app	olicable inte	rnational and natio	nal governπ	ient regulations.
	If I am a large quantity generator, I co practicable and that I have selected the and the environment; OR, if I am a sn available to me and that I can afford	ertify that I have a pro- e practicable method c nail quantity generator	ogram in place to reduce to reduce to rearment, storage, of the table to the table table to the table ta	r transport by highway a ce the volume and toxici r disposal currently avail aith effort to minimize m	ccording to app	olicable inte	rnational and natio	etermined to future threa manageme	be economically to human health int method that is
	If I am a large quantity generator. I copracticable and that I have selected the and the environment; OR, if I am a savailable to me and that I can afford Printed/Typed Vame	ertify that I have a pro- e practicable method c nail quantity generator	ogram in place to reduce to treatment, storage, of the treatment, storage, of the treatment	r transport by highway a ce the volume and toxici r disposal currently avail aith effort to minimize m	ccording to app	olicable inte	rnational and natio	etermined to future threa manageme	be economically to human health int method that is
7	If I am a large quantity generator, I concerned to the practicable and that I have selected the and the environment; OR, if I am a savailable to me and that I can afford. Printed/Typed Name 7. Transporter 1 Acknowledgement of Receipt	ertify that I have a pro- ertify that I have a pro- e practicable method on all quantity generator	gram in place to reduct treatment, storage, of the leaf of the lea	r transport by highway a ce the volume and toxici re the volume and toxici	ccording to app	olicable inte	rnational and natio	etermined to future threa manageme	be economically to human health mit method that is DAY YEAR 2 7 9 9
1	classified, packed, marked, and labeled if I am a large quantity generator. I consider the practicable and that I have selected the and the environment; OR, if I am a snavailable to me and that I can afford Printed/Typed Name 7. Transporter I Acknowledgement of Receip Printed/Typed Name Transporter 2 Acknowledgement of Receip Printed/Typed Name	ertify that I have a pro- ertify that I have a pro- e practicable method on all quantity generator	gram in place to reduct treatment, storage, of the leaf of the lea	r transport by highway a te the volume and toxici r disposal currently avail aith effort to minimize m lignature	ccording to app	olicable inte	rnational and natio	etermined to future threa i manageme MONTH	be economically to human health mit method that is DAY YEAR DAY YEAR
1	If I am a large quantity generator. I control of the environment, OR, if I am a selected than the environment, OR, if I am a shaulable to me and that I can afford. Printed/Typed Name Transporter 1 Acknowledgement of Receip Printed/Typed Name Transporter 2 Acknowledgement of Receip Printed/Typed Name Discrepancy Indication Space Control of the Co	ertify that I have a profe practicable method on all quantity generator of the profession of Materials	gram in place to reduce of treatment, storage, of have made a good of the place of	r transport by highway a tree the volume and toxic r disposal currently avail aith effort to minimize in liginature liginature Sidual management led at non management led at no management led	ty of waste general able to me white waste general able to me white waste general able to me with the waste general able to me with the waste general able to me with the waste general able to the wast	olicable inte	rnational and natio	etermined to future threa i manageme MONTH	be economically to human health mit method that is DAY YEAR DAY YEAR
11	If I am a large quantity generator. I control of the environment, OR, if I am a selected than the environment, OR, if I am a shaulable to me and that I can afford. Printed/Typed Name Transporter 1 Acknowledgement of Receip Printed/Typed Name Transporter 2 Acknowledgement of Receip Printed/Typed Name Discrepancy Indication Space Control of the Co	ertify that I have a proceed of the practicable method contail quantity generator of the process	gram in place to reduce of treatment, storage, of have made a good of the place of	r transport by highway a creation to the volume and toxicity disposal currently available effort to minimize in liginature Ignature	ty of waste general able to me white years and the same general able to me white years are generally all the general able to me white years are generally all the years are generally all the general able to me white years are generally all the general able to me white years are generally all the general able to me white years are generally all the general are generally all the general able to me white years are generally all the general able to me white years are generally all the general able to me white years are generally all the general are generally all the general are generally all the general are g	erated to the serated	triational and national decrease in the property and sect the Dest waste the Dest	etermined to future threa i manageme MONTH	be economically to human health mit method that is DAY YEAR DAY YEAR
1	If I am a large quantity generator. I controlled in the environment: OR, if I am a snavailable to me and that I have selected the and the environment: OR, if I am a snavailable to me and that I can afford. Printed/Typed Name Transporter I Acknowledgement of Receip Printed/Typed Name Transporter I Acknowledgement of Receip Printed/Typed Name Discrepancy Indication Space Controlled I acknowledgement of Receip Printed/Typed Name	ertify that I have a proceed of the practicable method contail quantity generator of the process	gram in place to reduce of treatment, storage, of have made a good of the place of	r transport by highway a creation to the volume and toxicity disposal currently available effort to minimize in liginature Ignature	ty of waste general able to me white years general able to me with the second	erated to the serated	triational and national decrease in the property and sect the Dest waste the Dest	etermined to future threa i manageme MONTH	be economically to human health mit method that is DAY YEAR DAY YEAR

SALES DISCREPANCY FORM					
SENERATOR: Norquay Trush MANIFEST #: PA 516681 DATE RECEIVED: 8-10-94 SALES REGION: NER LOAD #: 24411 CSR: Greg Ignasiak					
DISCREPANCIES	ACTION REQUIRED				
Line 11 b- 285994 - material profiled as	Please provide profile.				
w/ Solid and 43 inches of free liquid	Suggestion: 285990 amend manifest				
Line 11d - 285997- material profiled as	Please provide Profile. Suggestion: 414641				
non corrosive, 2 of 10 drums received w/ pH >13 (unable to pH w/ meter	please verify constituents and				
off scale).	sign profile and Discrepancy form amend manifest & LDR.				
	Darret 18.				
RESPONSE:					
	11				
ENSCO, LABORATORY: Annitte Scott CUSTOMER APPROVAL: / Air Hole t	DATE:				

ER-WM-129: Rev. 12/93

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 1/26	5/95 Identificat	tion Number PAD98236388	9
Company/Facility/Site Na	ame Norquay Technology Inc.		
This follow up inspection of Shannon of Norquay.	the above facility was done by Department S	Solid Waste Specialist Paul Jarde	l along with Mr. Shawn
During this inspection the fo	ollowing was observed:		
	te staged in the production room now have se s waste containers staged in the warehouse a		
Notes:			
	g has been done DELCORA. Mr. Shannon st a copy of the latest sampling results be forw		n lower than the previous
brought to the attention of thi manifest #PAE0516681. The	t has been submitted including manifest #PA is inspector by the DER Central Office staff. TSD, ENSCO of Dalton GA, contacted Nor as it had been profiled. The later manifest w	Mr. Shannon explained that this quay and informed them that son	manifest is a correction of ne of the waste included on
may operate the recovery proc	he onsite solvent recovery distillation does not cess under 266.90 so long as the stated requilling with a short explaination of the process.	rements are met. A notification of	f this activity should be
The pre-recovery "in process"	'solvent is defined as a waste and is subject	to the labeling and storage requir	rements of Chapter 262.
No violations were observed	during this inspection.		
This inspection report is	notice of the findings of an inspection conducted by	a representative of the Department. The	is report is formal notification of
any violations observed during the identified as a result of review of lat This report does not con immunity from legal action for any v	inspection. Additional notification of violations may boratory analyses or Department records. Institute an order or other appealable action of the De violation noted herein. Interviewed does not necessarily imply concurrence	be issued concerning either violations partment. Nothing contained herein st	noted herein, or other violations hall be deemed to grant or imply
Person interviewed (sign	facture) Copy mailed to facility	Date	, , ,
Inspector (signature)	Tool afer	Date	1/31/95
			Page of

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of In	spection/o/	'21/94' TI	me start	Time finish	
Name of I	nspector /	Pail- Juidel			
Company,	installation na	me Norgony y Industrial C	Technology I.		·
Location_	Rischall	& Industrial C	enter Front 1	110jd. 575. CA	lesTer PA 190
County	Celawais		Municipality _	chester City	
Identificat	tion number	FR098236388	99		
Name of r	esponsible offic	ial Norman Ell	Perton		
Title	co Priside	J			
-	ddress_5AA				
Area code	and telephone	number (2/5)	874-4330		
Name of p	erson interview	red SAA			
Title					
Mailing ac	ldress (<i>if differe</i>	ent from above)			
Area code	and telephone	number			
1. Curre	ent waste handl	ing method:			
	On-site	_	storage,	disposal	☐ PBR
b.	☑ On-site	use,	reuse,	recycle,	🔀 reclaim
c .	☑ Off-site	☐ treatment,	storage,	図 disposal	
d.	☐ Off-site	use,	reu se ,	recycle,	☐ reclaim
2. Amo	unt of hazardou	is waste produced:			
a.	~ 30°	Ø.	kg./mo.		
b.			kg./yr.		
locati	ion and type).	waste produced by I			
Waste	Number	Destination	Facility	Location ar	nd Type
0001, 2, 1	8,28,35,36 5	se last inspection	J-No changes -		
F003,4	<u> </u>				
. Source	e Reduction: [] accomplished, [] pro	posed, 🔲 not propos	sed being consile.	P
				,	

ER-WM-300: Rev. 11/93
Part B

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Norquiry	Technology	ID Number	FAC 782363 889	Date	10/21/94
--------------------	------------	-----------	----------------	------	----------

Hazardous Waste Inspection Report Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance **STATUS** LINE **CHAPTER** REQUIREMENT CITATION ITEM 2 | 3 | 4 Hazardous waste determination, performed on all waste streams 262.11 H₀01 Identification number 262.12 H002 Hazardous waste shipments offered only to licensed transporters 262.12(d) H₀03 H004 Authorization received from TSD facility for wastes shipped off-site within 262.13 H₀05 PA manifest used for intrastate shipments 262.20(b) H006 TSD state manifest or PA manifest used for out-of-state shipments 262.20(c) Manifests filled out properly and completely 262.20(a) H007 262.23(e)(f) H008 Manifests routed properly and within time limits (7 days) Proper U.S. DOT shipping containers or packages being used 262.30(1) H009 Shipping containers marked and labeled according according to U.S. DOT 262.30(2) H010 Containers of 110 gal. or less permanently marked with required hazardous 262.30(3) H011 waste label 262.33 H012 Placards offered to transporter H013 Waste in containers or tanks accumulated on-site for less than 90 days. 262.34(a)(1) H014 Wastes placed in containers properly marked and labeled or in tanks 262.34(a)(2) meeting requirements of Chapter 265, Subchapter J 262.34(a)(3) H015 Containers managed in accordance with Chapter 265, Subchapter I (any noncompliance for Subchapter I requirements is a violation of 262.34(a)(3)) H016 All containers of haz, waste in good condition 265.171 265.172 H017 Containers compatible with hazardous waste being stored within b). H018 265.173(a) Containers of hazardous waste kept closed c). H019 265.173(b) Containers of hazardous waste are managed to prevent leaks d). 265.173(c) H₀20 Containers of hazardous waste labelled to accurately identify contents e). Haz, waste accumulation areas inspected at least weekly 265.174 H021 f). Special requirements for ignitable, reactive and incompatible waste 265.176 - .177 H022 g). being met 265.178 H₀₂3 Proper containment and collection system(s) h). Containers clearly marked with accumulation date and visible for inspection 262.34(a)(4) H₀₂₄ On the job or classroom personnel training program as per 265.16 262.34(a)(5) H₀₂₅

Hazardous Waste Inspection Report Generators - Part B

3-Not-Determined 4-Non-Compliance 1-No Violation Observed 2-Not-Applicable **STATUS** LINE CHAPTER REQUIREMENT **CITATION** ITEM 2 3 Records retained at designated location for 20 years 262.40(a) H026 262.41(a) H₀₂₇ Quarterly reports submitted to the Department H028 262.42 Exception reporting procedures followed H029 262.45 Hazardous waste disposal plan, if required H030 Spill reporting procedures followed 262.46(a) H031 Preparedness, Prevention and Contingency Plan developed and 262.46(e) implemented in accordance with Chapters 264 and 265 Special requirements followed for international shipments 262.50,.53, H032 55, .60 Source reduction strategy prepared and available 262.80 H033

					•

Pennsylvania Department of Environmental Resources Bureau of Waste Management

Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

			1-N	o Violation Observed 2-Not Applicable 3-Not Determined 4-Non-C	Compliance
Status REQUIREMENT		REQUIREMENT	Citation 40 CFR		
1	2	3	4		Part 268
		<u> </u>		Generators	
χ				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)
$\sqrt{\chi}$		-		Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)
		X		Dilution not used as a substitute for treatment.	3
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)
				Storage Facilities	
	X			Facility verifies generators classification of waste in accordence with waste analysis plan.	25 Pa Code 265.13(c)
	X			Containers marked to identify contents and accumulation date.	50(a)(2)
	X			Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)
	X			Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)
	X			Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)
				Treatment Facilities, including PBR and ARR Pacilities	
		X		Dilution not used as a substitute for treatment.	3
X				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)
X				Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)
1				Land Disposal Facilities	
	X			Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)
	X			Facility land disposes of restricted waste only if it meets applicable treatment standard.	40
1	X			Facility retains copies of generator notifications and certifications.	7(c)(1)



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Post Office Box 2063 Harrisburg, Pennsylvania 17105-2063 January 5, 1993

Bureau of Waste Management

(717) 787-6239



This is in response to your November 30, 1992, request for a variance to the hazardous waste container storage area requirements of 25 Pa. Code Section 265.178. Although a variance cannot be granted from the provisions of that section, we believe, based on the type of waste handled at your facility, that the requirements are generally being met. Section 265.178 requires that container storage areas have a containment system capable of collecting and holding spills, leaks, and precipitation. Since the storage area at your facility is indoors, there will be no precipitation. Furthermore, since the waste handled at your facility is in a dry, chopped/granulated form, the concrete floor of the storage area is capable of collecting and holding any spills or leaks.

In conclusion, as long as the wastes managed at your facility are in a dry form, no modifications will need to be made to the existing storage area in order to conform to the requirements of 25 Pa. Code Section 265.178. We have discussed this matter with Charles Rogers of our Northeast Regional Office who concurs with this interpretation. If you have any additional questions or concerns, please feel free to contact Dwayne Womer of my staff at (717) 787-7381.

Sincerely,

Len Muchuslin

Leon L. Kuchinski, Chief Division of Hazardous Waste Management ' ER-WM-129: Rev. 12/93

Date of inspection 10/21/94

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES **BUREAU OF WASTE MANAGEMENT**

INSPECTION REPORT COMMENTS

____Identification Number___PAD982363889

Company/Facility/Site Name Norquay Technology Inc.	
This follow up inspection of the above facility was done by Department Solid Waste Specialist Paul Jardel with per Norman Ellerton, Vice President of Norquay.	mission of
During this inspection the following violations were observed:	
Three unlabeled 55 gal. drums of hazardous waste were observed in the production room. This is a violation of 262	.34(a)(2).
Near the portable hazardous waste containment pallets in the warehouse storage area, 27 drums of both liquid and swaste were observed to be outside of containment. This is a violation of 262.34 (a)(3) ref. 265.178 (a)(1). The enclos guideline (att. #1) would allow the facility to store the hazardous waste spent filters off of the portable containment upon the containment upon the storage area, 27 drums of both liquid and swaste waste waste observed to be outside of containment. This is a violation of 262.34 (a)(3) ref. 265.178 (a)(1). The enclose guideline (att. #1) would allow the facility to store the hazardous waste spent filters off of the portable containment upon the containment upon the containment are contained to the containment upon the containm	ed policy
Notes:	
The DELCORA discharge sampling results have been forwarded to the facility by this inspector. They have not yet by that POTW regarding a possible permit for the elevated toluene discharge.	been contacted
The two ASTs located in a previously flooded basement area have been investigated. These tanks were previously no JACA site investigation for the county. The "tank room" floor was flooded to a depth of app. 1 foot. I was able to gai tanks and observed that one of them was empty. The other tank was entirely full of a black creosote smelling viscous facility escorts stated that Norquay had never used the tanks, nor did they use any creosote material.	in the top of the
Stoppers or closures should be present on all hazardous waste containers in accordance with 265.173 (a).	
Manifest #PAC7590170 does not appear on the facility quarterly report. If this manifest was not voided in some way quarterly report should be submitted to the Department.	y an updated
The container storage requirements of 265.178 (e)(1) should be followed. It should be noted that 55 gal. drums are obe stacked 2 high.	only allowed to
During this facility inspection a hazardous waste transporter arrived onsite. Waste from this facility was to be transporter #PAE0516106. A routine hazardous waste transporter inspection was done on Dart Trucking Co. Inc. (PAtime.	corted on -AH0219) at this
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein identified as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deem immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowle was shown the report or that a copy was left with the person. Person interviewed (signature) Copy mailed to facility Date	n, or other violations ned to grant or imply edge that the person
Inspector (signature) Continued on rext Proge Date 10/2	6/94
	of

ER-WM-129: Rev. 12/93

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

The onsite solvent recovery by distillation may meet the of definition of a closed loop system. This will be investigated further furing the next inspection. No other violations were observed during this inspection. This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notifications where the proof of the proof of the findings of an inspection conducted by a representative of the Department. This report is formal notifications observed during the inspection. Additional notification of violations may be issued concerning effice violations noted herein, or other violations considered as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department except. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or minutely from legal action for any violation noted herein. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or minutely from legal action for any violation noted herein. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or minutely from legal action for any violation noted herein.	Date of inspection 10/21/94	Identification Numb	perPAD982363889
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein. This report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other vice lentified as a result of review of laboratory analyses of Department records. This report does not constitute an order or other specialistic action of the Department. Nothing contained herein shall be deemed to grant or munulity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the se shown the report or that a copy was left with the person.	Company/Facility/Site Name	Norquay Technology Inc.	
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notifically violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other vice institute or order or other specialists action of the Department. Nothing contained herein shall be deemed to grant or minumal special or any violation to other specialists action of the Department. Nothing contained herein shall be deemed to grant or minumal special or of the proposal order processor of the proposal order processor of the processor		ation may meet the of definition of a closed loop	system. This will be investigated further
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the was shown the report or that a copy was left with the person. Person interviewed (signature) Copy mailed to facility Date	No other violations were observed du	ring this inspection.	
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the ras shown the report or that a copy was left with the person. Person interviewed (signature) Copy mailed to facility Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the was shown the report or that a copy was left with the person. Person interviewed (signature) Copy mailed to facility Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the was shown the report or that a copy was left with the person. Person interviewed (signature) Copy mailed to facility Date		•	
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the ras shown the report or that a copy was left with the person. Person interviewed (signature) Copy mailed to facility Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violentified as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of interview to the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Person interviewed (signature) Copy mailed to facility Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violation as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of annunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Person interviewed (signature) Copy mailed to facility Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Date Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violation as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of annunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Person interviewed (signature) Copy mailed to facility Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Date Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Date Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violation as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of annunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Person interviewed (signature) Copy mailed to facility Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Date Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Date Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Date Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Date Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Date Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violentified as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of interview to the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the lass shown the report or that a copy was left with the person. Person interviewed (signature) Copy mailed to facility Date			
ny violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of inmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the ras shown the report or that a copy was left with the person. Person interviewed (signature) Copy mailed to facility Date			And the second s
10/26/01	ny violations observed during the inspection lentified as a result of review of laboratory a This report does not constitute an inmunity from legal action for any violation no Signature by the person interview	 Additional notification of violations may be issued concurallyses or Department records. order or other appealable action of the Department. Notificated herein. bed does not necessarily imply concurrence with the finding 	perning either violations noted herein, or other violations contained herein shall be deemed to grant or
nspector (signature) Paul a-ful Date Date	erson interviewed (signature)_		
	nspector (signature)	fall aful	Date



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT POF ENVIRONMENTAL RESOURCES

555 North Lane Conshohocken, PA 19428 October 25, 1994

(610) 832-6212

Southeast Regional Office

Mr. Vaughan Ellerton Norquay Technology Inc. Riverbridge Industrial Center P.O. Box 468 Chester, PA 19016

Re: Hazardous Waste Inspection PAD982363889, 10/21/94 City of Chester Delaware County

NOTICE OF VIOLATION

Dear Mr. Ellerton:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 270 of the Rules and Regulations of the Department. Violation of applicable sections of these regulations found during our inspection are as follows:

§262.34(a)(3) A generator may accumulate Hazardous waste onsite without a permit for 90 days or less if containers are managed in accordance with chapter 265 subchapter I (relating to use and management of containers), which states: §265.178(a)(1) Container storage areas shall have a containment system capable of collecting and holding spills, leaks and precipitation. The containment system shall have an impervious base underlying the containers which is free of cracks or gaps to contain leaks, spills and accumulated rainfall. All joints in an impervious base shall be sealed with appropriate sealants, and (2) Provide efficient drainage from the base to a sump or collection system.

(27) 55 gallon drums containing hazardous waste were without the required secondary containment.

§262.34(a)(2) A generator may accumulate hazardous waste onsite without a permit for 90 days or less if the waste is placed in containers which meet United States Department of Transportation packaging, marking and labeling requirements in 262.30 and 262.33 (relating to packing, labeling and marking; and placarding), which states:

§262.30(3) Before transporting or offering a shipment of hazardous waste for transportation offsite, a generator shall permanently mark each container of 110 gallons or less of hazardous waste according to United States Department of Transportation requirements under 40 CFR 172.304 (relating to marking)

Three containers of hazardous waste in the production room were observed to be without the approved labeling

You are hereby notified of both the existence of this violation as well as the need to provide for its prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for the abatement of this violation.

The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 610-832-6175.

Sincerely,

Paul A. Jarde

Solid Waste Specialist Waste Management Program

cc: Central Office Compliance Field File Regional File U.S. EPA



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT POF ENVIRONMENTAL RESOURCES

555 North Lane Conshohocken, PA 19428 February 15, 1994

(610) 832-6212

Southeast Regional Office

Mr. Vaughan Ellerton Norquay Technology Inc. Riverbridge Industrial Center P.O. Box 468 Chester, PA 19013

Re: Hazardous Waste Inspection PAD982363889, 2/4/94 City of Chester Delaware County

NOTICE OF VIOLATION

Dear Mr. Ellerton:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 270 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

§261.41(7) A person or municipality who modifies hazardous waste identification characteristics, ceases production of hazardous waste, changes his status from a small quantity generator to a large quantity generator or vice-versa, or whose waste is removed from a listing in this chapter shall file a notification form with the Department.

The facility should resubmit a Notification of Hazardous Waste Activity form (8700-12), to EPA Region III. Referencing the present PAD#, the facility should reclassify as a large quantity generator and should notify with regard to the onsite recovery of spent solvents. The facility should send a copy of this along with Supplemental Form (ER-WM-53) to DER Bureau Of Waste Management, P.O. 2063, Harrisburg PA 17120.

§262.34(a)(2) A generator may accumulate hazardous waste onsite without a permit for 90 days or less if the waste is placed in containers which meet United States Department of Transportation packaging, marking and labeling requirements in 262.30 and 262.33 (relating to packing, labeling and marking; and placarding), which states:

§262.30(3) Before transporting or offering a shipment of hazardous waste for transportation offsite, a generator shall permanently mark each container of 110 gallons or less of hazardous waste according to United States Department of Transportation requirements under 40 CFR 172.304 (relating to marking)

Three containers of hazardous waste were observed to be missing the approved label. Labels were also missing from containers of spent solvent which are stored in the warehouse prior to onsite recovery.

§262.34(a)(3) A generator may accumulate Hazardous waste onsite without a permit for 90 days or less if containers are managed in accordance with chapter 265 subchapter I (relating to use and management of containers), which states: §265.178(a)(1) Container storage areas shall have a containment system capable of collecting and holding spills, leaks and precipitation. The containment system shall have an impervious base underlying the containers which is free of cracks or gaps to contain leaks, spills and accumulated rainfall. All joints in an impervious base shall be sealed with appropriate sealants, and (2) Provide efficient drainage from the base to a sump or collection system.

Containers of hazardous waste should have adequate containment. This includes spent solvent stored before onsite recovery.

§262.34(a)(4) A generator may accumulate hazardous waste onsite without a permit for 90 days or less if on each container, each date on which any hazardous waste was placed in that container shall be clearly marked and visible for inspection.

Thirteen 55 gallon drums of hazardous waste were observed to be missing accumulation dates stating when waste had first been placed into the containers.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for the abatement of these violations.

The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

Mr. Ellerton: February 15, 1994 This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing. This letter shall also not be construed as a final action of the Department of Environmental Resources. If you have any questions concerning this matter, please feel free to contact me at 610-832-6175. Sincerely, faul of faull Paul A. Jardel Solid Waste Specialist Waste Management Program cc: Central Office Compliance Field File Regional File U.S. EPA

		•
		•
	4	•
		. *

0001-

Pennsylvania Department of Environmental Resources Bureau of Waste Management

Hazardous Waste Inspection Report Generators — Part A

Date of insp	ection2	14/94'	Time s	tart			-	Time finist	ـــــــ		
Name of ins	pector	Park Ja	rdel								
Company, in:	stallation na	ame Nor	90 ay 7	rechn.	01094	In	٠.				
Location <	werbrid	lge Indus	Trial Ce.	Jer,	Fron	To	end 11	31/12.	street	5. (LesTe	Pe. 1
County	Delawa	ame North		M	lunicipalit	ty	city o	f ches	Ten		
Identification	number _	PAO 982	-363889	,							
Name of res	ponsible off	ficial Vary	han Ell.	erton	,						
		esident									
Mailing addr	'ess										
Area code a	nd telephon	e number	15) 874	- 4330	<u> </u>						
		ewed_SAA									
		rent from above									
	•	e number									
	, .										
1. Current	waste hand	ling method:									
a.	🛭 On-site	e ☐ tseafn	nent, 🛭	storage,			disposal		PBR		
b.	🗷 On-site	us e ,	С	reus e.			recycle,	Ø	reclaim	,	
c.	air-110 🗷	e 🗆 treatm	nent, 🗆	storaça,	,	\boxtimes	disposal				
đ.	Off-shi	9 □ use,		reuse,			recycle,		reclaim		
2 Amount	of harordon	ıs waste produc	rad.								
a	_	3000			देख-तेश्वतः						
					•						
3. Types of Waste I		waste produce	d by Hazardou Destination			and o		Locati	on and	Tvoe	•
F223- F00	05	Ashland					Bingho	inton	NY. N	48 504925	3719
- FOUT - FOR	05	sufery k	leen lor,	ю.			Linde	~ NJ	^	50 00.28	2897

Prescrivenic Department of Environmental Resources Burnes of Woole Management

Hazardous Waste Inspection Report Generators — Part B

1-Ne Visiation Observed 2-Net Applicable 3-Net Determined 4-Non-						
-	Status	n L d O I n L i i L n I				
	2	3 4		262		
 	_		Hazardous waste determination, copies available	.11		
1			Identification number	.12(
\$_			Hazardous waste shipments offered only to licensed transporters	.12(
			Authorization received from TSD facility for wastes shipped off-site	.13		
1			PA manifest used for intrastate shipments	.20(1		
			Disposer state manifest or EPA formet manifest used for out-of-state shipments	20(
9	\times	1	Manifests filled out properly and completely	:39(8		
1	1>	7	Manifests routed properly and within time limits (7 days)	23(c,i,f,g,i)		
1	1	1	Proper U.S. DOT shipping containers or packages	.30(1		
-		1	Shipping containers merked and labeled according to U.S. DOT			
+	+	V	Containers of 110 gal. or less seemed with required PA label	.30(2		
-		+	Placerds effered to transporter	.30(3		
-	K	+	Wester accumulated on-site for less than 90 days	.34(1		
-	∤ॽ		Wastes stored in proper containers and properly marked and labeled			
 	┼	$\langle x \rangle$	Containers managed in assessdance with 265.171177	34(2		
-	-		Container's clearly merked with accumulation date and visible for inspection	34(3		
		K	Records retained at designated facation for 20 years	.40		
	\Diamond	1	Quarterly reports submitted to the Department	.41		
	\Diamond	+	Exception reporting procedures followed	.42		
$\overline{\mathbf{x}}$			Hazardous waste disposel plan, if required			
	X	1-1	Spill reporting precedures followed	.46(a		
	X		Proparadness, Prevention and Contingency Plan and implemented 265.5154	34(a)(5) .46(e		
V			Special regulrements followed for international shipments	50.53.55.0		
	X	-	On the jub or classroom personnel training program 265.16	.34(a)(5		
	\Rightarrow		Drum accumulation area inspected weekly as per 265.174	.34(a)(3		
	X		Menifests legible (all copies)			
	$\langle \rangle$	-	Tanks managed in accordance with 265.190195	.23(h)		
-	\Rightarrow		Preparedness and Prevention as per 265.3137	.34(a)(
	\leftrightarrow		Emergency Procedures as per 265.55-56	.34(a)(

Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

					Citation						
1	Status 2 3 4			REQUIREMENT							
		 	Generators								
\langle				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)						
\langle				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)						
-		X		Dilution not used as a substitute for treatment.	3						
\langle				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6						
1	<i>y</i> .			Storage Facilities							
	-1 			Facility vorifies generators classification of waste in accordence with waste analysis plan.	25 Pa Code 26 5.13 (c)						
Ì				Containers marked to identify contents and accumulation date.	50(a)(2)						
			Notification sent with shipments of wastes that do not meet treatment standards. Notification and certification sent with shipments of wastes meeting treatment standards.								
	X	ИТ		Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)						
				Treatment Facilities, Including PBR and RRR Facilities							
		X		Dilution not used as a substitute for treatment.	3						
		X		Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)						
		X		Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5) (b)(6)						
	1			Land Disposal Facilities							
1	\prod			Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)						
1				Facility land disposes of restricted waste only if it meets applicable treatment standard.	40						
7	V			Facility retains copies of generator notifications and certifications.	7(c)(1)						

Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Wasta Management

Inspection Report Comments

Date of Inspection 2/4/44 Identification Number PAD 982 363 889
Company/Facility/Site Name Norquay Technology Inc-
Inspection of the above facility was done as a port of
The special Projects Section review of the JACA Phase I
assessment of The Kiverbridge Inclustrial Center
Present for the above inspection were Paul Tirdel (sws) Christian
Kita (Envourented Treine wan), wetter Payne (Hydro.), and Tom Cancingian
OF The Coportment, and Mr. Vorgham Ellerton, vice President of
Norquay.
The above facility nonvientures a number of chemical
intermediates for the pharmacutical and other industries.
warte streams consist of spent solvents for the most part and
also discorded filters contaminated with robert, and Locardons was to
oil generated Thru dryer operations.
During This inspection The following violations were observed:
This facility generates over 1000 kg. of horadous naste per mont
and should renotify to EPA and NGR as to The change in status.
The facility should also notify regarding The onsite recovery of
spent solvents and follow the guidelines of chapter 266.
The facility should lobel containers of houndors natte as
per 262. 34(a)(2), 262-70(3), and mark lanch containin with
an accomulation start date as per. 262.34(a)(4).
In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements. This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person Interviewed (signature) Date
Inspector (signature) Contd on next page. Date
Page of

Commonwealth of Pennsylvania Department of Environmental Resources Burnen of Waste Management

Inspection Report Comments

Date of Inspection 2/4/94' Identification Number PAD 952363589
Company/Facility/Site Name
Three Containers of horardius naste were missing the approved label
and 13 containers had no accomulation start date.
IT was also roted that all containers of harondons vaste were
lacking propon containment required in 262.34 (a) (3) Ref. 265.178 (a) (1)
NOTES: The Following have been forwarded to The Facility!
Notification of Reg. vaste activity. Form 8700-12
DER Supplement ERWN-53, Source Reclustion Strategy monual
Hazardons naste Regulations. PPC plan quidelines
Erasterly Report Form 55.55A.
One & Time restrictions all monifests were not looked over.
Since The Facility will sow be a large Quantity Generator, Many of The
LAG requirements are not in place and will Take Time to imphoment.
a sample of waste noter was taken at This Time. All sumps when
into a waste water tank and are Then discharged to celcoRA (POTW), This
Tank swelled of solvent and The liquid was observed to have at heart
2 phases. Analysis requested were ZHE, serivolatiles,
no other violations were observed during This inspection
In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements. This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person Interviewed (signature) capy mailed to fourlity Date
Inspector (signature) Paul a fuchl Date 2/15/94